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VIA FEDERAL EXPRESS

Hon. Richard J. Sullivan
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

USDS SDNY
DOCUMENT
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**In Re: Tribune Company Fraudulent Conveyance Litigation (12 MC 2296):
Request for Substitution of New Law Firm for Member of Defendants'
Executive Committees**

Dear Judge Sullivan:

Pursuant to Master Case Order No. 3 [Docket No. 45], the Court appointed Leonard A. Gail of Massey & Gail LLP as Executive Committee Member¹ in the Committee Actions for Named Defendant Thomas Finke. (Master Case Order No. 3 at ¶ 24, p. 17). Mr. Finke has terminated his relationship with Massey & Gail LLP, and has retained Joseph D. Frank and Reed Heiligman of FrankGecker LLP as his attorneys in this matter.

Pursuant to paragraph 23 of Master Case Order No. 3, I request that the Court order the substitution of attorneys Joseph D. Frank and Reed Heiligman of FrankGecker LLP for attorney Leonard A. Gail of Massey & Gail LLP as counsel to Named Defendant Thomas Finke, and as a member of the Defendants' Executive Committees under Master Case Order No. 3. The enclosed notice of submission of this letter requesting this change has been sent to all counsel via ECF filing in 12 MC 2296.

Very truly yours,

Joseph D. Frank

The Clerk of the Court is directed to terminate the motion pending at Doc. No. 101. Further, the Clerk shall remove this letter (Doc. No. 103) and the motion pending at Doc. No. 101 from the docket for 12 MC 2296 and place them on the docket for 11 MD 2296. Finally, the motion pending at Doc. No. 2421 of 11 MD 2296 shall be terminated.

JDF/cc
Enclosure

SO ORDERED:

Hon. Richard J. Sullivan, U.S.D.J.

4/10/13

¹ Terms not defined herein shall have the meaning ascribed to them in Master Case Order No. 3 [Docket No. 45].